

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF NEW YORK

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9384-2557 Québec Inc., a Canadian : 1:19-CV-00501-TJM-CFH
corporation; MINEDMAP, INC., a Nevada
corporation; and SERENITY ALPHA, LLC, a
Nevada limited liability, and other similarly
situated individuals

**AFFIDAVIT OF DANIEL KIM IN
SUPPORT OF MOTION FOR
CIVIL AND CRIMINAL
CONTEMPT CITATION**

Plaintiff, :

against : (ECF Case)

NORTHWAY MINING, LLC, a New York limited :
liability company; MICHAEL MARANDA, an
individual; MICHAEL CARTER, an individual;
CSX4236 MOTORCYCLE SALVAGE, LLC, a New
York limited liability company; DROR SVORAI,
an individual; MINING POWER GROUP, INC., a
Florida corporation; HUDSON DATA CENTER,
INC, a New York Corporation, MICHAEL
MARANDA, LLC, a New York Limited liability
company; PORTER KING HILL CONTRACTING,
LLC, a New York limited liability company;
COINMINT, LLC, a Delaware limited liability
company; OSWEGO DATA LLC, a New York
Limited Liability Company; LORI S. THOMPSON,
LCSW, PLLC, a professional limited liability
corporation; LORI S. THOMPSON, an individual,
ANTHONY PORTER, an individual; and DONALD
D'AVANZO, an individual

Defendants. :

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I, Daniel Kim, being of lawful age and sound mind and under penalty of perjury as set forth in 28 U.S.C. 1746, make this affidavit in support of Plaintiffs' Motion for Civil and Criminal Contempt against Defendants Michael Maranda and Michael Carter; and against nonparty, Melissa Welsh. If called to testify, I can and would testify as follows, under oath:

1. I formed Minedmap, Inc. ("MinedMap") and Serenity Alpha, LLC ("Serenity") along with Allen Song. I am the Chief Executive Officer of MinedMap and the Managing Member of Serenity.
2. I formed MinedMap and Serenity to engaging in bitcoin mining and to perform other work related to bitcoin mining.
3. As set forth in the Complaint, sometime in June 2018, Allen Song and I met Joe Stephanelli, a broker of bitcoin miners who in turn introduced us to Michael Maranda and Michael Carter.
4. Michael Maranda and Michael Carter represented to Allen Song and me that they operated a legitimate company called Northway Mining, LLC that they had cheap access to power, and that they had the ability to host thousands of miners at their facility located at 2 Flint Mine Road in Cossackie, New York.
5. After negotiations, MinedMap and Serenity entered into an Agreement Northway Mining on September 21, 2020.
6. Northway agreed to host MinedMap and Serenity's miners and MinedMap and Serenity agreed to allow Northway to host its miners. Id.

7. After MinedMap and Serenity executed the Agreement with Northway, they purchased the miners that they would ultimately ship to Northway.

8. Specifically, MinedMap and Serenity paid \$878,279.99 for 2,380 s9j 14.5 tera hash Bitmain bitcoin miners; and paid \$106,340.00 for 409 s9 13.5 tera hash Bitmain bitcoin miners. In total, MinedMap and Serenity purchased 2,789 miners for a total of \$984,619.99.

9. In addition, MinedMap and Serenity paid \$120,000.00 to ship the 2,380 miners and \$5,000.00 to ship the 409 miners. In total, MinedMap and Serenity paid \$125,000.00 in shipping costs.

10. On September 30, 2018, MinedMap and Serenity's Miners were delivered to Northway at 2 Flint Mine Road. Donald D'Avanzo, Northway's Chief Operating Officer, signed the delivery form indicating that Northway had received MinedMap and Serenity's Miners.

Plaintiffs also purchased Power Supply Units ("PSUs") and paid \$85.00 for each of the 409 s9 13.5 tera hash; and \$90.00 for each of the 2380 s9j 14.5 tera hash miners. In total, Plaintiffs paid \$248,965.00 for the Power Supply Units suited to the miners Plaintiffs sent to Defendants.

12. In total, MinedMap and Serenity incurred \$1,114,619.99 in purchasing and shipping the Miners to Northway.

13. Separately, Northway sent \$432,000.00 as a deposit against the electrical power that Northway would incur for electricity used to operate the miners MinedMap and Serenity sent to Northway.

14. On July 22, 2020, Allen Song and I appeared at 193 East Seneca Street Oswego New York and at 2140 County Route 1 Oswego New York to pick up certain bitcoin miners from Defendants consistent with this Court's Order, but we did not find our bitcoin miners at the two locations Defendants provided.

15. Allen Song and I each spent more than two hours apiece looking at each location Defendants provided, but we did not find our miners.

16. We looked at serial numbers on each of the miners and saw that the serial numbers had been scraped or sawed off the bitcoin miners.

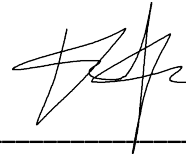
17. In addition to lacking serial numbers, both Allen Song and I know what our bitcoin miners physically look like and we did not find any of our miners.

18. While at one point we found four miners that we believed matched the serial numbers of our miners, up further inspection of those four miners, it became clear the serial numbers had been transposed on to the miners. As an example, three miners had the same serial numbers. Serial numbers are unique to each miner and no two miners can have the same serial numbers.

19. The damages set forth in the spreadsheet attached to the Show Cause Order is the damages Plaintiffs seek against Defendants.

Dated this 31st day of July 2020.
Las Vegas, Nevada

[SIGNATURE APPEAR ON NEXT PAGE]

A handwritten signature in black ink, consisting of stylized, overlapping loops and strokes, positioned above a horizontal line.

Daniel Injoon Kim